

The rejections are respectfully traversed. Reconsideration of Claims 1-3, 5-27, and 29-42 are respectfully requested.

### PATENTABILITY OF CLAIMED INVENTION

As amended, Claim 1 recites:

A method for producing a structured document, the method comprising:  
receiving a definition file including document type definitions (DTD) to  
generate a tree structure showing hierarchical relationships of  
document elements;  
displaying an output presentation along with the tree structure, the output  
presentation including a number of displayable objects and respective  
decoration attributes about each of the displayable objects;  
associating at least one of the document elements in the tree structure  
with one of the displayable objects; and  
creating the structured document from the output presentation in  
accordance with the at least one of the document elements being  
associated with the one of the displayable objects.

*(emphasis added)*

To reject Claim 1, the Examiner applies Borgendale, Fallside and Am to reject certain features, particularly, "...to generate a tree structure showing hierarchical relationships of document elements" and "associating at least one of the document elements ... with one of the display objects". The Applicants respectfully contest the combination of the references as it is believed that there is no motivation to combine these references in the manner proposed by the Examiner. Nevertheless, even if these three references were to be combined, the combination would still fail to teach or suggest the features recited in Claim 1.

As clearly shown in FIG. 3B and the corresponding description thereof (e.g., lines 1-2 and lines 19-24 of page 18) in the present invention, the display 322 shows an unstructured document (i.e., an output presentation thereof) and display 324 shows an XML tree 330 produced from DTD 328 such that "associating at least one of the document elements in the tree structure with one of the displayable objects (in the unstructured document); and creating the structured document from the output presentation in accordance with the at least one of the document elements being associated with the one of the displayable objects" can be achieved.

Further lines 12- 23 of page 3 of the pending application clearly defines what a structured document means, essentially, a tagged document, such as an HTML file received over the Internet, is a structured document. In contrast, lines 14-16 of page 15 of the pending application shows what an unstructured document is. In other words, a structured document determines how contents are displayed for a given application (e.g., Microsoft Internet Explorer) and can be very different with another application while an unstructured document is an output presentation of the contents from a given application (e.g., the popular PDF file).

Borgendale teaches how to present a document on a display based on a document construction module (e.g. Figures 19-21 thereof). In view of the subject matter regarded as the invention, a result from Borgendale is an unstructured document that at best could be used as an input in the present invention to generate a structured document. It is respectfully submitted that Borgendale does not teach or even suggest that the system so disclosed is for producing a structured document from the output presentation (i.e., an unstructured document).

Stated by the Examiner on page 4 of the Office Action, Fallside teaches conversion of a coordinate based document to an equivalent tag based structured document. Fallside and Borgendale are to achieve two opposite results. Clearly there could be no any benefits to either Borgendale or Fallside when the two references were combined.

Agreed that Borgendale does not specifically teach displaying a tree structure along with a document, the Examiner cites that Arn teaches such. The Applicant wishes to refer the Examiner to lines 5-9 of page 8 in Arn, what is shown as graphic array 2 of FIG. 1 in the left display of FIG. 2 is the DTD of the document. In contrast, although a DTD structure 328 is shown in FIG. 3B of the present application, Claim 1 recites that "a definition file including document type definitions (DTD) to generate a tree structure showing hierarchical relationships of document elements". In other words, the tree structure (shown as an XML tree 330 in FIG. 3B) is not the DTD itself, it is generated from the DTD. It is respectfully submitted that Arn does not teach or suggest the generation of a tree structure from a DTD. Accordingly, the Applicant respectfully requests the Examiner to withdraw the rejection to Claim 1 and its dependent claims.

Claim 15 is rejected with the similar reasons. The Applicant wishes to apply the above stated reasons to support Claim 15. Accordingly, the Applicant respectfully requests the Examiner to withdraw the rejection to Claim 15 and its dependent claims.

Independent Claims 25 and 39 are computer program product claims, mirroring the preceding method claims. Accordingly, the Applicant respectfully requests that the Examiner reconsider the amended Claims 25 and 39 and their respective corresponding dependent claims in view of the above remarks.

### SUMMARY

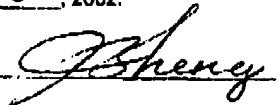
As the reasons stated above, the combined features are evidently not taught nor suggested in Borgendale, Fallside and Arn, viewed alone or in combination. The Applicant believes that Claims 1-3, 5-27, and 29-42 shall be in condition for allowance and respectfully request the Examiner to withdraw the final rejection.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplementary Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at (408)777-8873.

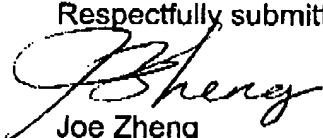
I hereby certify that this correspondence is being faxed to the attention of Mr. Examiner William L. Bashore at (703)746-7239,

on 12/20, 2002.

Signed:



Respectfully submitted;



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